

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

-v-

ANDREY KOSTIN et al.,

Defendants.

Case No. 1:24-cr-00091 (GHW)

**DECLARATION OF DAVID C. RYBICKI IN SUPPORT OF DEFENDANT VADIM
WOLFSON'S REPLY TO GOVERNMENT'S OPPOSITION TO DEFENDANTS'
MOTIONS TO SUPPRESS, STRIKE, FOR A BILL OF PARTICULARS, AND FOR
PRODUCTION OF GRAND JURY MATERIALS**

Pursuant to 28 U.S.C. § 1746, I, David C. Rybicki, declare under oath as follows:

1. I am a partner at K&L Gates LLP in Washington, D.C., and counsel to Vadim Wolfson.
2. I make this Declaration in support of Mr. Wolfson's Reply to Government's Opposition to Defendants' Motions to Suppress, Strike, for a Bill of Particulars, and for Production of Grand Jury Materials.
3. Annexed as Exhibit A hereto is a true and accurate copy of Examination Notes from FBI's Computer Analysis Response Team, Washington Field Office.
4. Annexed as Exhibit B hereto is a true and accurate copy of a Technical Report from FBI's Digital Evidence Laboratory.
5. Annexed as Exhibit C hereto is a true and accurate copy of an Affidavit in Support of an Application Under Rule 41 for a Warrant to Search and Seize filed in the Eastern District of Virginia.

6. Annexed as Exhibit D hereto is a true and accurate copy of the FD-302 memorializing [REDACTED]'s interview with the government on January 13, 2023.
7. Annexed as Exhibit E hereto is a true and correct copy of an email from [REDACTED] dated January 14, 2023.
8. Annexed as Exhibit F hereto is a true and correct copy of an email from Assistant United States Attorney Emily Deininger to me dated September 9, 2024.
9. Annexed as Exhibit G hereto is a true and correct copy of a photograph date stamped May 23, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 13, 2025
Washington, D.C.

/s/ David C. Rybicki
David C. Rybicki

EXHIBIT A

Federal Bureau of Investigation



Computer Analysis Response Team
Washington Field Office
Examination Notes



Summary Information

FBI Washington Field Office Northern Virginia Resident Agency (NVRA) 9325 Discovery Boulevard Manassas, VA 20109	Examiner: Digital Forensic Examiner (DFE) Jeffrey B. Ralston Case Agent: Special Agent (SA) Danielle Lockridge Legal Authority: Search Warrant		
Case Title: ANDREY LEONIDOVICH KOSTIN (Subject), et al; CHRISTODOULOS VASSILIADES (aka, CHRISTODOULOS VASILIADIS) (Subject); ERIC WHYTE (Subject); VADIM WOLFSON (aka, VADIM BELYAEV) (Subject); GANNON BOND (Subject); ALEXANDER VORONTSOV (Subject); and ALEXEY SHKOLNIKOV (aka, ALEKSEY SHKOLNIKOV) (Subject) EURASIAN CRIMINAL ENTERPRISE	UCFN: 281H-WF-3578641 281H-WF-3578641-CART Submission ID: 296990		
Date Service Requested: 4/29/2024	Date Specimen(s) Received: 5/23/2024	Date Processing Started: 5/23/2024	Date Exam Completed: ?????
Hardware Utilized <ul style="list-style-type: none"> F5405807-JBR – Dell Precision T7910, S/T: 2KHTDB2, Windows 10 Enterprise F5460601-JBR – Dell Precision T7820, S/T: 4L57QR3, Windows 11 Enterprise Tableau TX-1 v23.4 	Software Utilized: <ul style="list-style-type: none"> Case Manager v2.24.2.14 Cellebrite Physical Analyzer v7.69.0.10 GrayKey v1.22.0.27801658 Magnet Axiom v8.1.0.40287 Teracopy Pro v3.9 		

Request Details:

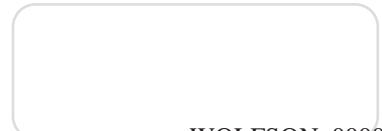
SA Danielle Lockridge requested that the Computer Analysis Response Team (CART) perform a data extraction and processing of the captioned items (ref. Service Request ID 167968).

Questioned Object Designations:

1B	Barcode	Designators	Description	Examined
1B3	E6633319	QWF3_iPhone	One (1) Apple iPhone 15 Pro, model: A2848, serial number (SN): F6D4N0H2L0, 1TB capacity, designated and hereafter referred to as QWF3_iPhone .	Yes
1B8	E6633314	QWF8_Dell	One (1) Dell Inspiron laptop, model: 3501, service tag (ST): 8QT8ZJ3, designated and hereafter referred to as QWF8_Dell . QWF8_Dell contained one (1) 512GB non-volatile memory express (NVMe) solid state drive, model: CL1-3D512-Q11 NV, SN: TW07YGY09DH0018C079J, designated and hereafter referred to as QWF8_Dell_SSD .	Yes

Pre-Examination Information and Receipt of Evidence

Date	Initials	Item(s)	Notes
5/23/2024	JBR	N/A	CART Service Request Assignment <ul style="list-style-type: none"> DFE Ralston assigned CART Request Submission ID: 296990.



CART EXAMINATION NOTES

5/23/2024	JBR	N/A	Legal Authority <ul style="list-style-type: none"> DFE Ralston received copies of two (2) search warrants and confirmation from SA Lockridge that the items were covered under the original warrants per the Southern District of New York (SDNY) Assistant U.S. Attorney (AUSA).
5/23/2024	JBR	N/A	Creation of Case <ul style="list-style-type: none"> Examiner used Case Manager to create a new Case: 281H-WF-3578641_296990 on the Operational Wide-Area Network (OpWAN).
5/23/2024 - 5/24/2024	JBR	1B3 1B8	Receipt and Inventory of Evidence <ul style="list-style-type: none"> Examiner received evidence items 1B3 and 1B8 from the NVRA Evidence Control Center (ECC). Items were inventoried, labeled, and photographed. Description of evidence item can be located in the Summary Information > Questioned Object Designations section above.

Imaging, Processing and Staging for Review

5/23/2024 - 9/16/2024	JBR	QWF3_iPhone QWF8_Dell	<p>QWF3 iPhone</p> <ul style="list-style-type: none"> Examiner used GrayKey to acquire a full filesystem extraction from QWF3_iPhone. The extraction and supporting files were downloaded to a staging drive and Examiner used Teracopy to copy the extraction and supporting files from the staging drive to the Source directory of the Case on OpWAN with verification. Examiner used Axiom to process the extraction of QWF3_iPhone. On 9/16/2024, Examiner processed the extraction of QWF3_iPhone using Cellebrite Physical Analyzer to facilitate the filter review per written request (e-mail) from Southern District of New York (SDNY) Assistant US Attorney (AUSA) Emily Deininger. <p>QWF8 Dell</p> <ul style="list-style-type: none"> Examiner removed the back cover of QWF8_Dell to access and extract the NVMe solid state drive (QWF8_Dell_SSD). Examiner connected QWF8_Dell_SSD to the TX-1 and a verified E01 image was created directly to the Source directory of the Case on OpWAN. Examiner used Axiom to process QWF8_Dell_SSD.E01. Axiom identified Partition 3 as being encrypted with Clear Key BitLocker which it was able to decrypt without a password successfully prior to processing. After initial processing successfully completed, Examiner used Axiom to conduct additional processing for Optical Character Recognition (OCR) to extract text from files to assist with key word searching. Axiom was used to generate a portable case to the Restricted directory. Examiner used Teracopy to copy the portable case to the Notes directory with verification to enable filter/case agent review.
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CART EXAMINATION NOTES

Creation of Master Copy			
Date	Initials	Item(s)	Notes
6/17/2024 - 6/18/2024	JBR	DEWF3_8_ MasterCopy	<p>Creation of Master Copy</p> <ul style="list-style-type: none"> Examiner used Teracopy to create a verified master copy of the full filesystem extraction from QWF3_iPhone, the image from QWF8_Dell and the Axiom case results for each to a forensically-prepared Seagate 1TB hard drive, Model: ST1000LM048-2E7172, S/N: ZKP2XT2T.

Creation of Discovery Copy			
Date	Initials	Item(s)	Notes
6/24/2024	JBR	DEWF3_8_ Discovery	<p>Creation of Discovery Copy for Defense</p> <ul style="list-style-type: none"> Examiner received a USB Seagate One Touch 1TB SSD, S/N: NAE700V4 from SA Roland Chattaway and used a TX-1 to forensically-prepare (wipe). Examiner used Teracopy to copy of the full filesystem extraction from QWF3_iPhone and the image from QWF8_Dell to the drive with verification. <p>** Discovery drive has been encrypted using BitLocker requiring the following password to access: [REDACTED]</p>
			<p>***** Note the creation of the additional “Discovery” copy (DEWF8_DellDiscovery) and the “Working” copy for the filter team (DEWF3_iPhone_CellebriteRPT)? Include model, S/N, etc. *****</p>

Meeting to Discuss Opt-Out with DOJ			
Date	Initials	Item(s)	Notes
7/10/2024	JBR	N/A	<p>Meeting to Discuss Opt-Out</p> <ul style="list-style-type: none"> On 7/10/2024 Examiner participated in an MS Teams meeting to discuss the ingest of the digital media into Relativity for filter and investigative review with the following participants: <ul style="list-style-type: none"> Emily Deininger (SDNY) David Felton (SDNY) Masha Maizel (SDNY) Roland Chattaway (FBI) Danielle Lockridge (FBI) Marc Labreche (FBI) Assistant General Counsel Marc Labreche stated that this would require an official opt-out request and AUSA Emily Deininger confirmed that they would like to proceed. Per FBI policy, no additional work shall be performed by CART Examiners after an opt-out agreement has been reached.



CART EXAMINATION NOTES

Post-Exam Verifications			
Date	Initials	Item(s)	Notes
????	JBR		<p>Post-Exam Verifications</p> <ul style="list-style-type: none"> • Examiner conducted a post-exam hash verification for the contents of extraction and image with positive results.

Disposition of Evidence			
Date	Initials	Item(s)	Notes
5/28/2024	JBR	1B3 1B8	Examiner returned original evidence items 1B3 and 1B8 to the NVRA ECC for custody and maintenance.

Disposition of Derivative Evidence			
Date	Initials	Item(s)	Notes
6/18/2024	JBR	DEWF3_8_ MasterCopy	Examiner completed the Collected Item Log entry in Sentinel and corresponding Chain of Custody for <i>DEWF3_8_MasterCopy</i> and submitted to the NVRA ECC for custody and maintenance. Assigned 1B13 .
6/24/2024	JBR	DEWF3_8_ Discovery	Examiner gave <i>DEWF3_8_Discovery</i> to SA Roland Chattaway. The BitLocker password required to access the hard drive was given to SA Chattaway via high-side e-mail.
No Further Work – End of Notes			

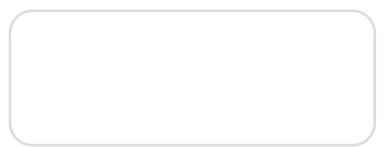


EXHIBIT B



Federal Bureau of Investigation
Digital Evidence Laboratory

11000 Wilshire Blvd.
Suite 1700
Los Angeles, CA 90024

TECHNICAL REPORT

To: SA Danielle Lockridge
Washington Field Office (WFO)

Date: 03/06/2024
Case ID: 281H-WF-3578641
Request No.: SUID 293714

Request Date: 02/21/2024

Item(s) Submitted:

- 1B3: One (1) Silver iPhone 15 Pro 2TB Model A2848; SN F6D4N0H2L0; IMEI1: 354078642946642; IMEI2: 354078643315540 , Passcode [REDACTED]
1B4: One (1) iPad Pro Model A2069 SN DMPFD07MNTJ3 IMEI 352782115943307,Passcode [REDACTED]
1B5: One (1) Black 128GB DataTraveler thumbdrive
1B6: One (1) Black 64GB DataTraveler thumbdrive
1B7: One (1) Yellow 1MB thumbdrive

Details of Examination:

Included below are the results from the CART Request submitted on February 21, 2024. Forensic work was performed by FBI Computer Analysis Response Team (CART) Forensic Examiner (FE) John A Gomez, unless otherwise stated.

Timeline Summary

Dates of Forensic Work: February 21, 2024 to March 7, 2024

Overall Summary

On February 21, 2024, Cart Request 293714 requested the following:

1. Request assistance with onsite images/extractions as well as live preview.
2. Conduct Full File system extraction on 1B3 iPhone and 1B4 iPad seized from Search.
3. Process in Physical Analyzer
4. Create Cellebrite Reader Reports for 1B3 and 1B4.

Legal Authority

Search Warrant was singed on February 21, 2024, by US Magistrate Judge Mark Lane, in the Western District of Texas.

Request Results-- 1. Request assistance with onsite images/extractions as well as live preview.

On February 22, 2024, FE Gomez provided search warrant support in the seizure of an iPhone (subsequently entered as 1B3) and an iPad (subsequently entered as 1B4), and three (3) thumbdrives (1B5, 1B6, 1B7). The passcode [REDACTED] was provided by the owner of 1B3 and 1B4.

Request Results--2. Conduct Full File system extraction on 1B3 iPhone and 1B4 iPad seized from Search.

1. **Evidence item 1B3** was checked out from Austin evidence control
2. A Physical Inventory was conducted. The iPhone was still powered on. Airplane mode, WiFi, and Bluetooth were off. Pictures were taken of the device turned on confirming the serial number F6D4N0H2L0; and IMEI 1: 354078642946642; and IMEI 2: 354078643315540.
3. A full file system extraction was completed using GrayKey Version 1.17.7.26651541, App Bundle 3.31.027012057.
4. Additional Password search was successful. FE Gomez went into the iPhone settings, then clicked Passwords. Face Recognition was not recognized 3 times which prompted a required passcode. [REDACTED] was entered which opened up the password section.
5. The different apps were visible, but had dots as passwords. FE Gomez clicked onto the dots which revealed the hidden password. A copy of each password was transferred to a txt file and utilized in the processing.
6. **Evidence item 1B4** was checked out from Austin evidence control.
7. A Physical Inventory was conducted. The iPhone was still powered on. Airplane mode, WiFi, and Bluetooth were off. Pictures were taken of the device turned on confirming the serial number DMPFD07MNTJ3; and IMEI 352782115943307
8. A full file system extraction was completed using GrayKey Version 1.17.7.26651541, App Bundle 3.31.027012057.
9. Additional Password search was successful. FE Gomez went into the iPad settings, then clicked Passwords. Face Recognition was not recognized 3 times which prompted a required passcode. [REDACTED] was entered which opened up the password section.
10. The different apps were visible, but had dots as passwords. FE Gomez clicked onto the dots which revealed the hidden password. A copy of each password was transferred to the same txt file which contained passwords from Graykey and the iPhone. This was utilized during the processing.

Request Results--3. Process in Physical Analyzer

11. Cellebrite Physical Analyzer 7.66.09 was used to process 1B3 and 1B4.
12. Passwords derived from GrayKey (FFS) and via manual search were added to the processing.
13. IMEI 1 was first used for processing the FFS of 1B3.
14. After completion of IMEI 1, IMEI 2 was processed with the same password txt file. This time IMEI 2 was used with the FFS.
15. 1B4 only contained one IMEI for processing.

Request Results--4. Create Cellebrite Reader Reports for 1B3 and 1B4.

16. Two separate Cellebrite reader reports were created following the processing completion of 1B3 IMEI 1 and IMEI 2.
17. A third Cellebrite reader report was created following the processing completion of 1B4.

Additional Results--Imaging

18. **Evidence Items: 1B5, 1B6, and 1B7** were checked out of Austin evidence Control.
19. Pictures were taken of the items.
20. Using a Tableau TX 1 F2928901 forensic imaging machine and a forensically wiped staging drive, 1B5, 1B6, and 1B7 were imaged.
21. An MD5 hash value was generated during the imaging of QLA5_JG032924, QLA6_JG032924, and QLA7_JG032924. The computed MD5 hash values were verified following creation.
22. The images were then digitally transferred to the Austin Server.
23. The items were MD5 verified following the transfer to the server.

Request Results—Derivative evidence was created containing all items of source folder and work folders.

Derivative Evidence/Copies:

1B11: **MASTER CART COPY DESA11_JG030724** One (1) Western Digital 1.5TB HDD, containing the archived copy of the source folders of 1B3 1B4 1B5 1B6 and 1B7 along with the work folder.

Specifically, this contains the FFS of 1B3 and 1B4 and the e01 images of 1B5, 1B6, and 1B7. It also contains the UFED Reader reports of 1B3 and 1B4. No processing of 1B5, 1B6 and 1B7 was conducted.

Disposition of Items:

1B3, 1B4, 1B5, 1B6, and 1B7 were returned to evidence. Derivative item 1B11 was entered into evidence.

GOMEZ.JOHN.
F65M64K21
Examiner _____
Forensic Examiner SA John A Gomez

Digitally signed by
GOMEZ.JOHN.F65M64K21
Date: 2024.03.07 14:52:06
-06'00'

Los Angeles
Computer Analysis Response Team

EXHIBIT C

[FILED UNDER SEAL]

EXHIBIT D

[FILED UNDER SEAL]

EXHIBIT E

[FILED UNDER SEAL]

EXHIBIT F

From: [Deininger, Emily \(USANYS\)](#)
To: [Rybicki, David C.](#)
Cc: [Silverblatt, Rob S.](#); [Felton, David \(USANYS\)](#); [Shugert, Shawn \(NSD\)](#); [Johnson, Oleksandra \(CRM\)](#); [Harper, Michael C.](#); [Lockridge, Danielle Nicole \(WF\) \(FBI\)](#)
Subject: RE: United States v. Andrey Kostin, et al., 24 Cr. 91 (GHW): 2024.07.01 Govt. Discovery Production (Wolfson Individual Prod 5)
Date: Monday, September 9, 2024 6:44:25 PM

This Message Is From an External Sender

This message came from outside your organization.

David— I'm putting you in touch with FBI SA Danielle Lockridge, cc'd here, to coordinate the return of the devices in DC. I believe they can be made available to you this week if you can find a mutually beneficial time.

From: Rybicki, David C. <David.Rybicki@klgates.com>
Sent: Monday, September 9, 2024 12:31 PM
To: Deininger, Emily (USANYS) <EDeininger@usa.doj.gov>
Cc: Silverblatt, Rob S. <Rob.Silverblatt@klgates.com>; Felton, David (USANYS) <DFelton@usa.doj.gov>; Shugert, Shawn (NSD) <Shawn.Shugert@usdoj.gov>; Johnson, Oleksandra (CRM) <Oleksandra.Johnson2@usdoj.gov>; Harper, Michael C. <Michael.Harper@klgates.com>; Canick, Molly (USANYS) <MCanick@usa.doj.gov>
Subject: [EXTERNAL] Re: United States v. Andrey Kostin, et al., 24 Cr. 91 (GHW): 2024.07.01 Govt. Discovery Production (Wolfson Individual Prod 5)

Can I pick them up in DC? He doesn't live in Texas at present
 Sent from my iPhone

On Sep 9, 2024, at 12:27, Deininger, Emily (USANYS) <Emily.Deininger@usdoj.gov> wrote:

Yes, we have asked FBI to have these shipped back to Texas, and will let you know when they have arrived so that Mr. Wolfson can pick them up from the FBI's local office.

From: Rybicki, David C. <David.Rybicki@klgates.com>
Sent: Monday, September 9, 2024 11:30 AM
To: Deininger, Emily (USANYS) <EDeininger@usa.doj.gov>; Silverblatt, Rob S. <Rob.Silverblatt@klgates.com>
Cc: Felton, David (USANYS) <DFelton@usa.doj.gov>; Shugert, Shawn (NSD) <Shawn.Shugert@usdoj.gov>; Johnson, Oleksandra (CRM) <Oleksandra.Johnson2@usdoj.gov>; Harper, Michael C. <Michael.Harper@klgates.com>; Canick, Molly (USANYS) <MCanick@usa.doj.gov>
Subject: [EXTERNAL] RE: United States v. Andrey Kostin, et al., 24 Cr. 91 (GHW): 2024.07.01 Govt. Discovery Production (Wolfson Individual Prod 5)

Hi Emily – per our conversation a few weeks ago in New York, can we retrieve Mr. Wolfson's devices from FBI in DC? Please let me know how to get these back. Thanks, David

From: Deininger, Emily (USANYS) <Emily.Deininger@usdoj.gov>
Sent: Wednesday, August 28, 2024 12:40 PM
To: Silverblatt, Rob S. <Rob.Silverblatt@klgates.com>; Rybicki, David C. <David.Rybicki@klgates.com>
Cc: Felton, David (USANYS) <David.Felton@usdoj.gov>; Shugert, Shawn (NSD) <Shawn.Shugert@usdoj.gov>; Johnson, Oleksandra (CRM) <Oleksandra.Johnson2@usdoj.gov>; Harper, Michael C. <Michael.Harper@klgates.com>; Canick, Molly (USANYS) <Molly.Canick@usdoj.gov>
Subject: RE: United States v. Andrey Kostin, et al., 24 Cr. 91 (GHW): 2024.07.01 Govt. Discovery Production (Wolfson Individual Prod 5)

Thank you for confirming.

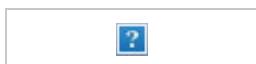
Best,
Emily

From: Silverblatt, Rob S. <Rob.Silverblatt@klgates.com>
Sent: Tuesday, August 27, 2024 9:34 PM
To: Deininger, Emily (USANYS) <EDeininger@usa.doj.gov>; Rybicki, David C. <David.Rybicki@klgates.com>
Cc: Felton, David (USANYS) <DFelton@usa.doj.gov>; Shugert, Shawn (NSD) <Shawn.Shugert@usdoj.gov>; Johnson, Oleksandra (CRM) <Oleksandra.Johnson2@usdoj.gov>; Harper, Michael C. <Michael.Harper@klgates.com>; Canick, Molly (USANYS) <MCanick@usa.doj.gov>
Subject: [EXTERNAL] RE: United States v. Andrey Kostin, et al., 24 Cr. 91 (GHW): 2024.07.01 Govt. Discovery Production (Wolfson Individual Prod 5)

Emily,

We have no privilege claims on the laptop at this time and no objection to the prosecution commencing its review of the laptop. To the extent we later identify anything, we will let Molly know.

Best,
Rob



Rob Silverblatt
Partner
K&L Gates LLP
1601 K Street NW

Washington, D.C. 20006
Phone: 202-778-9132
Fax: 202-778-9100
rob.silverblatt@klgates.com
www.klgates.com

From: Deininger, Emily (USANYS) <Emily.Deininger@usdoj.gov>
Sent: Tuesday, August 27, 2024 10:30 AM
To: Rybicki, David C. <David.Rybicki@klgates.com>
Cc: Felton, David (USANYS) <David.Felton@usdoj.gov>; Shugert, Shawn (NSD) <Shawn.Shugert@usdoj.gov>; Johnson, Oleksandra (CRM) <Oleksandra.Johnson2@usdoj.gov>; Silverblatt, Rob S. <Rob.Silverblatt@klgates.com>; Harper, Michael C. <Michael.Harper@klgates.com>; Canick, Molly (USANYS) <Molly.Canick@usdoj.gov>
Subject: RE: United States v. Andrey Kostin, et al., 24 Cr. 91 (GHW): 2024.07.01 Govt. Discovery Production (Wolfson Individual Prod 5)

David—

I understand from Molly that she received a spreadsheet with privilege claims from your team with respect to Wolfson's cellphone, produced at Wolfson_00000274. She says she did not receive anything with respect to his laptop, produced at Wolfson_00000275. Do you have any privilege claims to make with respect to the laptop, or are you still reviewing? If still reviewing, it would be helpful to get a sense of when you expect that to be complete.

Thanks,
Emily

From: Rybicki, David C. <David.Rybicki@klgates.com>
Sent: Thursday, August 15, 2024 2:54 PM
To: Deininger, Emily (USANYS) <EDeininger@usa.doj.gov>
Cc: Felton, David (USANYS) <DFelton@usa.doj.gov>; Shugert, Shawn (NSD) <Shawn.Shugert@usdoj.gov>; Johnson, Oleksandra (CRM) <Oleksandra.Johnson2@usdoj.gov>; Silverblatt, Rob S. <Rob.Silverblatt@klgates.com>; Harper, Michael C. <Michael.Harper@klgates.com>; Canick, Molly (USANYS) <MCanick@usa.doj.gov>
Subject: [EXTERNAL] RE: United States v. Andrey Kostin, et al., 24 Cr. 91 (GHW): 2024.07.01 Govt. Discovery Production (Wolfson Individual Prod 5)

Emily — We are working on the review and are on track to complete it next week.

By way of background, we are informed by our ediscovery team that the data arrived in a disjointed fashion that necessitated a burdensome and time-consuming extraction exercise. For that reason, we only recently have been able to commence our review. To the extent you have more material in the

pipeline, I would ask for our respective ediscovery teams to connect in order to avoid a repeat of the last production, the technical aspects of which escape me.

I look forward to our upcoming meeting this Monday and hope you've had a good summer so far. Best, David

From: Deininger, Emily (USANYS) <Emily.Deininger@usdoj.gov>
Sent: Thursday, August 15, 2024 1:02 PM
To: Rybicki, David C. <David.Rybicki@klgates.com>
Cc: Felton, David (USANYS) <David.Felton@usdoj.gov>; Shugert, Shawn (NSD) <Shawn.Shugert@usdoj.gov>; Johnson, Oleksandra (CRM) <Oleksandra.Johnson2@usdoj.gov>; Silverblatt, Rob S. <Rob.Silverblatt@klgates.com>; Harper, Michael C. <Michael.Harper@klgates.com>; Canick, Molly (USANYS) <Molly.Canick@usdoj.gov>
Subject: RE: United States v. Andrey Kostin, et al., 24 Cr. 91 (GHW): 2024.07.01 Govt. Discovery Production (Wolfson Individual Prod 5)

David—

I understand from Molly that she has not yet been contacted by you regarding any information that you believe to be potentially privileged on Wolfson's cellphone or laptop, which were produced to you last month. We are past the 30-day period for review that was originally discussed. Do expect to identify any potentially privileged information and, if so, by when? We don't want the filter review process to be unnecessarily delayed.

Best,
Emily

From: Imperato, Anthony (USANYS) [Contractor] <Alperato@usa.doj.gov>
Sent: Monday, July 1, 2024 5:29 PM
To: Rybicki, David C. <David.Rybicki@klgates.com>; Silverblatt, Rob S. <Rob.Silverblatt@klgates.com>; Harper, Michael C. <Michael.Harper@klgates.com>; Noreus, Robertson M. <robertson.noreus@klgates.com>
Cc: Deininger, Emily (USANYS) <EDeininger@usa.doj.gov>; Felton, David (USANYS) <DFelton@usa.doj.gov>; Shugert, Shawn (NSD) <Shawn.Shugert@usdoj.gov>; Johnson, Oleksandra (CRM) <Oleksandra.Johnson2@usdoj.gov>; Stupp, Olivia (CRM) <Olivia.Stupp@usdoj.gov>
Subject: United States v. Andrey Kostin, et al., 24 Cr. 91 (GHW): 2024.07.01 Govt. Discovery Production (Wolfson Individual Prod 5)

Counsel,

Today's Government discovery production has been sent to Mr. Noreus via FedEx. The

FedEx tracking number is : 7968 7863 8483

The password for the drive (e-dat_2014) is: [REDACTED]

Thank you.

Sincerely,
Anthony Imperato
FSA Records Examiner
Illicit Finance & Money Laundering Unit
U.S. Attorney's Office – SDNY
26 Federal Plaza – 38th Floor
New York, NY 10278
Office: 212-637-2470
Cell: 917-922-4735

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EXHIBIT G



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